

# EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS-----X  
YEVGENYA SHINDMANIndex No.:  
Date Purchased:  
**SUMMONS**

Plaintiff,

Plaintiff designates Kings  
County as the place of trial.

-against-

TARGET CORPORATION

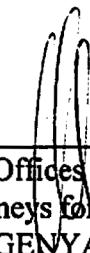
The basis of venue is:  
CPLR 503

Defendants.

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**To the above named Defendants:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: BROOKLYN, NEW YORK  
October 15, 2021

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Law Offices of William Pager  
Attorneys for Plaintiff(s)  
YEVGENYA SHINDMAN  
203-205 Kings Highway  
Brooklyn, New York 11223  
718-998-1010  
Our File No. 4307DO

TO: TARGET CORPORATION  
c/o CT Corporation System  
25 Liberty Street  
New York, NY 10005

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS-----  
YEVGENYA SHINDMAN

X

Index No.:  
Date Purchased:

Plaintiff,

VERIFIED  
COMPLAINT

-against-

TARGET CORPORATION

Defendants.

X

Plaintiff by her attorneys, **LAW OFFICES OF WILLIAM PAGER** complaining of the Defendants, respectfully alleges, upon information and belief:

1. That at all times herein mentioned, the Plaintiff was, and still is a resident of the County of Kings, State of New York.
2. That at all times herein mentioned, the Defendant **TARGET CORPORATION** was and still is a foreign corporation, duly organized and existing under and by virtue of the laws of the State of New York.
3. That at all times herein mentioned, the Defendant **TARGET CORPORATION** was and still is a foreign entity, duly organized and existing under and by virtue of the laws of the State of New York.
4. That at all times herein mentioned, the Defendant **TARGET CORPORATION** was and still is a foreign corporation duly authorized to do business in the State of New York.
5. That at all times herein mentioned, the Defendant, **TARGET CORPORATION** maintained a place of business in the County of Kings, State of New York.

6. That at all times herein mentioned, the Defendant, **TARGET CORPORATION** was, and still is, doing and transacting business in the County of Kings, State of New York.

7. That at all times herein mentioned, the Defendant **TARGET CORPORATION** owned the premises and appurtenances and fixtures thereto, located at Target store 8973-95 Bay Parkway, Brooklyn, NY 11214.

8. That at all times herein mentioned, the Defendant **TARGET CORPORATION** operated the premises and appurtenances and fixtures thereto, located at Target store 8973-95 Bay Parkway, Brooklyn, NY 11214.

9. That at all times herein mentioned, the Defendant **TARGET CORPORATION** managed the premises and appurtenances and fixtures thereto, located at Target store 8973-95 Bay Parkway, Brooklyn, NY 11214.

10. That at all times herein mentioned, the Defendant **TARGET CORPORATION** maintained the premises and appurtenances and fixtures thereto, located at Target store 8973-95 Bay Parkway, Brooklyn, NY 11214.

11. That at all times herein mentioned, the Defendant **TARGET CORPORATION** supervised the premises and appurtenances and fixtures thereto, located at Target store 8973-95 Bay Parkway, Brooklyn, NY 11214.

12. That at all times herein mentioned, the Defendant **TARGET CORPORATION** inspected the premises and appurtenances and fixtures thereto, located at Target store 8973-95 Bay Parkway, Brooklyn, NY 11214.

13. That at all times herein mentioned, the Defendant **TARGET CORPORATION** repaired the premises and appurtenances and fixtures thereto, located at Target store 8973-95 Bay Parkway, Brooklyn, NY 11214.

14. That at all times herein mentioned, and upon information and belief, Defendant **TARGET CORPORATION** placed and displayed goods and various items for sale within the aforesaid premises.

15. That at all times herein mentioned, and on August 19, 2021, Plaintiff **YEVGENYA SHINDMAN** was lawfully on the aforesaid premises.

16. That at all times herein mentioned, and on August 19, 2021, while Plaintiff **YEVGENYA SHINDMAN** was lawfully about the aforesaid premises/store, she was caused to sustain serious and permanent injuries.

17. That the above mentioned occurrence, and the results thereof, were caused by the joint, several and concurrent negligence of the Defendants and/or said Defendants' agents, servants, employees and/or licensees in the ownership, operation, management, supervision, maintenance and control of the aforesaid premises.

18. That no negligence on the part of the Plaintiff contributed to the occurrence alleged herein in any manner whatsoever.

19. Defendants were negligent, careless and reckless in the ownership, management, control, maintenance, operation, inspection, supervision and repair of the aforesaid premises/store and the equipment wherein, and Defendant were otherwise negligence, careless and reckless under circumstances then and there prevailing.

20. That, upon information and belief, Defendants had actual notice of this defective condition prior to August 19, 2021.

21. That, upon information and belief, Defendants had constructive notice of this defective condition prior to August 19, 2019.

22. That, upon information and belief, Defendants caused and created the defective condition.

23. That by reason of the foregoing, Plaintiff **YEVGENYA SHINDMAN** was caused to sustain serious injuries and to have suffered pain, shock and mental anguish; that these injuries and their effects will be permanent; and as a result of said injuries Plaintiff has been caused to incur, and will continue to incur, expenses for medical care and attention; and, as a further result, Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

24. That as a result of the foregoing, Plaintiff was damaged in the sum of **FIVE MILLION (\$5,000,000.00) DOLLARS.**

**WHEREFORE**, Plaintiff **YEVGENYA SHINDMAN** demands judgment against the Defendants in the sum of **FIVE MILLION (\$5,000,000.00) DOLLARS**, together with the costs and disbursements of this action.

Dated:      Brooklyn, New York  
                  October 15, 2021

Yours, etc.  


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Law Offices of William Pager  
Attorneys for Plaintiff(s)  
**YEVGENYA SHINDMAN**  
203-205 Kings Highway  
Brooklyn, New York 11223  
718-998-1010  
Our File No. 4307DO

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**Index No.**  
**SUPREME COURT OF THE STATE OF NEW YORK**  
**COUNTY OF KINGS**

YEVGENYA SHINDMAN

**Plaintiff,**

**-against-**

## TARGET CORPORATION

## Defendants.

## **SUMMONS AND COMPLAINT**

**Law Offices of William Pager**  
*Attorneys for Plaintiff(s)*  
203-205 Kings Highway  
Brooklyn, New York 11223  
Phone: 718-998-1010  
Fax: 718-998-8046

**PLEASE TAKE NOTICE**

That the within is a true copy of a  
named Court on entered in the office of the clerk of the within

That a copy of which the within is a true copy will be presented for settlement to the Hon. One of the Judges of the within named Court at on at 9:30 a.m.

Due and timely service of the within is hereby admitted

Dated:

X

Attorneys for

LAW OFFICES OF WILLIAM PAGER  
Corporate,etc

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS**



\*420223\*

Index no :527036/21  
Date of Purchase: 10/22/2021  
ATTY FILE No: 4307DO  
Court Date:  
EJS #:

PLAINTIFF(S): **YEVGENYA SHINDMAN**

vs.

DEFENDANT(S): **TARGET CORPPRATION**

STATE OF NEW YORK COUNTY OF KINGS ss.:

**MARCEL HOLLEY**, being duly sworn deposes and says; deponent is not a party to this action, is over the age of 18 years and resides in the State of New York.

That on **12/14/2021** at **10:16 AM** at **C/O CT CORPORATION, 28 LIBERTY ST, New York, NY 10005** Deponent served the with in **SUMMONS, VERIFIED COMPLAINT AND CONSENT TO E-FILING SUPREME COURT CASE** by personally delivering to and leaving with **Kartik Pandya**, for **TARGET CORPPRATION** a true copy thereof, and that deponent knew the person so served to be the **INTAKE REPRESENTATIVE** and stated(s) he was authorized to accept legal papers for the corporation.

A description of the person served is as follows:

Sex	Color of skin/race	Color of hair	Age(Approx)	Height (Approx)	Weight (Approx)
<b>MALE</b>	<b>BROWN</b>	<b>BLACK</b>	<b>35</b>	<b>5'4"-5'8"</b>	<b>131-160 Lbs.</b>
Other Features: <b>Glasses</b>					

Sworn to and subscribed before me on  
12/15/2021

Deborah Savoia  
Notary Public, State of New York  
No. 01-6268936  
Qualified in Suffolk County  
Commission Expires 9/17/2024

X

**MARCEL HOLLEY**

License#: 2045442

Advantage Process Servers, Inc. DBA Zellner Wood  
102 Jericho Turnpike,  
Suite 104

Floral Park, NY 11001

516-326-6060

NYC DCA License #: 1451565

